



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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JUL 3 0 2014

James V. Johnson
Director, Office of National Laboratories
Department of Homeland Security
Science and Technology Directorate
U. S. Department of Homeland Security
Washington, D.C. 20528

RE: Department of Homeland Security Independent Test & Evaluation Laboratory at the
Transportation Security Laboratory Draft Tiered Environmental Assessment

Dear Mr. Johnson:

The Environmental Protection Agency (EPA) has reviewed the Department of Homeland Security (DHS) and Federal Aviation Administration's (FAA) Draft Environmental Assessment dated July 2014 for the construction of a DHS Independent Test & Evaluation Laboratory at the existing FAA William J. Hughes Technical Center, located at the Atlantic City Airport in Atlantic City, New Jersey. The purpose of the EA is to evaluate the environmental impacts of the construction of the laboratory and serve as the National Environmental Policy Act documentation for the FAA action of permitting the DHS land use rights on the Atlantic City Airport. This EA is tiered off an original FAA 2006 EA and Finding of No Significant Impact that evaluated the construction and siting of a DHS Independent Test & Evaluation Laboratory.

The EPA has the following comments on the EA.

- Atlantic County, New Jersey is in non-attainment for ozone. Therefore the project will require a conformity applicability analysis under the General Conformity Rule (Clean Air Act Section 176(c)). The applicability analysis should include equipment and fugitive emissions from construction, tree removal and grading.
- The Atlantic City airport is located on the New Jersey Coastal Plain Sole Source Aquifer and requires review under Section 1424(e) of the Safe Water Drinking Act. To finalize the review, the EA should discuss how chemical and/or radiological wastes will be disposed. EPA does understand that the existing facility has a designation as a conditionally exempt small quantity generator of hazardous waste and is applying to retain that designation. However, it is not clear how chemical and perhaps radiological wastes will be disposed.

- The Egg Harbor Township Municipal Utilities Authority is pursuing financial assistance from the New Jersey Environmental Infrastructure Financing Program for the reconstruction of the FAA Pumping Station located at the FAA's William J. Technical Center. The EA should evaluate both projects for cumulative environmental impacts.

EPA acknowledges the proactive environmental work being done by the Technical Center, and applauds the environmental commitment to replant trees and native plants that will be removed by the construction of the laboratory.

Thank you for the opportunity to comment. If you have any questions, please call Lingard Knutson of my staff at (212) 637-3747.

Sincerely,



Grace Musumeci, Chief
Environmental Review Section